INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

(317) 232-8603
(800) 451-6027
www.state.in.us/idem

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

LinEl Signature
101 LinEl Drive
Mooresville, Indiana 46158

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F109-14253-00021	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:June 12, 2002 Expiration Date:June 12, 2007

TABLE OF CONTENTS

TABLE OF CONTENTS (Continued)

SECTION D.2 FACILITY OPERATION CONDITIONS

TABLE OF CONTINUED

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates an architectural metal work plant manufacturing aluminum skylights, handrails, and other architectural metal parts.

Authorized individual:	Robert Sloan, Managing Member
Source Address:	101 LinEl Drive, Mooresville, Indiana 46158
Mailing Address:	101 LinEl Drive, Mooresville, Indiana 46158
SIC Code:	3446
Source Location Status:	Morgan County
County Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) Four (4) spray paint booths (identified as PB-1, PB-2, PB-3, and PB-4), constructed in 2002, equipped with electrostatic air atomization spray guns and used to paint aluminum skylights, handrails, and architectural metal. Each paint booth has a maximum throughput capacity of 500 square feet of aluminum per hour. Emissions of particulate matter are controlled using dry filters, while emissions of VOC and HAP are controlled using a regenerative thermal oxidizer.

(b) Three (3) spray paint booths (identified as A, B, and C), constructed in 1987 and used for coating aluminum parts. The coatings are applied using air atomization spray guns. Paint booths A and B have a maximum capacity of 253.1 square feet per hour. Paint booth C has a maximum capacity of 56.25 square feet per hour. Paint booth A exhausts at stack A; paint booth B exhausts at stack B; and paint booth C exhausts at stack C. Emissions of particulate matter are controlled using dry filters.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired curing ovens, including:

(1) One (1) natural gas-fired curing oven with a maximum heat input capacity of 5.175 MMBtu per hour, exhausting at stack No. 3, with VOC and HAP emissions controlled using a regenerative thermal oxidizer.

(2) One (1) natural gas-fired oven with a maximum heat input capacity of 2.5 MMBtu per hour, exhausting at stack D1.

(b) Natural gas-fired combustion sources with heat input equal to or less than 10 MMBtu per hour, including:

(1) One (1) natural gas-fired burn off oven with a maximum heat input capacity of 0.78 MMBtu per hour, exhausting at stack No. 4.

(2) Three (3) natural gas-fired liquid tank heaters, each with a maximum heat input capacity of 1.5 MMBtu per hour, exhausting at stacks No. 5, No. 6, and No. 7.

(c) Machining where an aqueous cutting coolant continuously floods the machining interface.

(d) Degreasing operations that do not exceed 145 gallons per 12 months and not subject to 326 IAC 20-6.

(e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.

(f) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(g) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(h) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(i) Paved and unpaved roads and parking lots with public access.

(j) Activities with uncontrolled emissions equal to or less than the exemption thresholds provided in 326 IAC 2-1.1-3(d)(1), including:

(1) One (1) etch cleaner tank;

(2) One (1) etch and strip tank;

(3) One (1) chrome phosphate tank;

(4) Grinding operations; and

(5) One (1) pour and debridge line.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover

the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes

or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8] [326 IAC 2-2]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The

notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section

D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(a) Four (4) spray paint booths (identified as PB-1, PB-2, PB-3, and PB-4), constructed in 2002, equipped with electrostatic air atomization spray guns and used to paint aluminum skylights, handrails, and architectural metal. Each paint booth has a maximum throughput capacity of 500 square feet of aluminum per hour. Emissions of particulate matter are controlled using dry filters, while emissions of VOC and HAP are controlled using a regenerative thermal oxidizer.

(b) Three (3) spray paint booths (identified as A, B, and C), constructed in 1987 and used for coating aluminum parts. The coatings are applied using air atomization spray guns. Paint booths A and B have a maximum capacity of 253.1 square feet per hour. Paint booth C has a maximum capacity of 56.25 square feet per hour. Paint booth A exhausts at stack A; paint booth B exhausts at stack B; and paint booth C exhausts at stack C. Emissions of particulate matter are controlled using dry filters.

Insignificant Activities:

(a) Natural gas-fired curing ovens, including:

(1) One (1) natural gas fired curing oven with a maximum heat input capacity of 5.175 MMBtu per hour, exhausting at stack No. 3, with VOC and HAP emissions controlled using a regenerative thermal oxidizer.

(2) One (1) natural gas-fired oven with a maximum heat input capacity of 2.5 MMBtu per hour, exhausting at stack D1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

General Construction Conditions

D.1.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

D.1.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.1.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

D.1.4 The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration and Development Section, verifying that the emission units were constructed as proposed in the application.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.5 Volatile Organic Compounds (VOC)Limitations [326 IAC 8-2-9][326 IAC 2-8]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 when using extreme performance coating pounds of VOC per gallon of coating excluding water, delivered to the electrostatic air atomization spray guns.

(b) When operating the thermal oxidizer to achieve the limit for 326 8-2-9, the thermal oxidizer shall maintain a minimum 95% overall efficiency. Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 95%, the VOC content of the coating shall not exceed 133.4 pounds of VOC per gallon of coating solids delivered to the applicator.

(c) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.6 Compliance Schedule for Achieving Compliance with 326 IAC 8-2-9

Pursuant to the consent decree of June 19, 2001, the Permittee shall comply with the following compliance schedule:

(a) On or before March 1, 2002, the Permittee shall submit documentation which confirms that the company has secured the funds necessary to finance the purchase and installation of the control equipment described in Condition D.1.6(d).

(b) On or before March 1, 2002, the Permittee shall submit documentation confirming that the control equipment have been ordered and indicating the anticipated dates of delivery and installation.

(c) If the Permittee fails to secure funds, order the control equipment, and submit documentation in compliance with Conditions D.1.6(a) and (b) March 1, 2002, then Permittee shall cease operation of the spray paint booths until such time as the control equipment is installed.

(d) On or before June 28, 2002, the Permittee shall install and commence operation of a rotary concentrator and thermal oxidizer to control emissions from the spray paint booths or cease operation of these paint booths until such time as the controls are installed and operational.

(e) On or before August 27, 2002, the Permittee shall conduct compliance tests to confirm that the capture and destruction efficiency of the control equipment complies with the limits in Condition D.1.5.

D.1.7 Hazardous Air Pollutants (HAPs) [326 IAC 2-8] [326 IAC 2-8] [326 IAC 2-4.1-1]

(a) Prior to the installation of the new paint booths (PB-1, PB-2, PB-3, and PB-4) and control equipment required in Condition D.1.6, the Permittee shall limit the total amount of hazardous air pollutants used in the spray painting booths A, B, and C to less than ten (10) tons per twelve (12) consecutive month period for any single HAP and less than

twenty-five (25) tons per twelve (12) consecutive month period for any combination of HAPs.

(b) After the installation of the new paint booths and control equipment required in Condition D.1.6, the existing paint booths A, B, and C shall be decommissioned and the emissions from the new paint booths PB-1, PB-2, PB-3, and PB-4 shall be controlled using the regenerative thermal oxidizer. The amount of hazardous air pollutants (HAPs) used in the painting booths PB-1, PB-2, PB-3, and PB-4 shall be limited as follows:

(1) The amount of any single HAP used in the spray paint booths shall be limited to two hundred (200) tons per twelve (12) consecutive month period. This is equivalent to emissions of any single HAP from the entire source to less than 10 tons per twelve (12) consecutive month period.

(2) The amount of any combination of HAPs used in the spray paint booths shall be limited to five hundred (500) tons per twelve (12) consecutive month period. This is equivalent to emissions of any combination of HAPs from the entire source to less than twenty-five (25) tons per twelve (12) consecutive month period.

Compliance with these limits makes the provisions of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to this source.

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 2-8]

(a) Prior to the installation of the new paint booths (PB-1, PB-2, PB-3 and PB-4) and the control equipment required in Condition D.1.6, the Permittee shall limit the amount of VOC used in the spray paint booths A, B and C to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) After the installation of the new paint booths and control equipment required in Condition D.1.6, the existing paint booths (A, B, and C) shall be decommissioned and the VOC emissions from the new paint booths shall be controlled using the regenerative thermal oxidizer. The total amount of VOC used in the spray paint booths PB-1, PB-2, PB-3, and PB-4 shall be limited to 1,980 tons per twelve (12) consecutive month period. Compliance with this condition will limit VOC emissions from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period and makes the provisions of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.9 Particulate Matter (PM_{10}) [326 IAC 2-8-4][326 IAC 2-2]

The total amount of solids delivered to the applicators at the spray paint booths PB-1, PB-2, PB-3, and PB-4 shall be limited to less than 2,829 tons per twelve (12) consecutive month period, based on a sixty-five (65) percent transfer efficiency and a ninety (90) percent control efficiency for the dry filters. This throughput limitation is equivalent to PM_{10} emissions of less than 99.0 tons per year for the four paint booths and PM_{10} emissions of less than 100 tons per year for the entire source. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable. As a result of this PM_{10} limit, and since PM_{10} is equal to PM emissions for the spray paint booths, the PM emissions from the entire source are also limited to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) are not applicable.

D.1.10 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the spray paint booths shall not exceed allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.11 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.1.12 Particulate Matter (PM and PM_{10})

To comply with Conditions D.1.9 and D.1.10, the dry filers used for PM and PM_{10} control shall be in operation and control emissions from the spray paint booths at all times that the paint booths are in operation.

D.1.13 Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1] [326 IAC 8-2-9] [326 IAC 2-8]

To comply with Conditions D.1.5, D.1.6, D.1.7 and D.1.8, the regenerative thermal oxidizer for VOC and HAP control shall be in operation no later than June 28, 2002 and shall control emissions from the spray paint booths PB-1, PB-2, PB-3 and PB-4, and the 5.175 MMBtu per hour curing oven at all times that these paint booths are in operation. Beginning June 28, 2002, paint booths A, B, C shall be decommissioned and the 2.5 MMBtu per hour oven shall be used solely for removing water from aluminum parts after washing

D.1.14 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

On or before August 29, 2002, the Permittee shall perform VOC testing utilizing Methods 25 (40 CFR 60, Appendix A) or other methods as approved by the Commissioner.

D.1.15 VOC, HAP and PM_{10} Emissions

(a) Compliance with the VOC usage and content limitations contained in Conditions D.1.5 and D.1.8 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Compliance with the HAP and solids usage limitations contained in Conditions D.1.7 and D.1.9 shall be determined using formulation data supplied by the coating manufacturer.

D.1.16 VOC, HAP and PM_{10} Emissions

Compliance with Conditions D.1.5, D.1.7, D.1.8, and D.1.9 shall be demonstrated within 30 days of the end of each month based on the total VOC, HAP, and solids usage for the most recent twelve (12) consecutive month period.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.17 Thermal Oxidizer [326 IAC 2-8] [326 IAC 2-4.1-1] [326 IAC 8-2-9]

The regenerative thermal oxidizer shall operate at all times that the spray paint booths and 5.175 MMBtu per hour curing oven are in operation. When operating, the thermal oxidizer shall maintain the minimum operating temperature specified by the manufacturer until a temperature and fan amperage has been determined from the most recent compliant stack test, as approved by IDEM. The temperature correlates to an overall VOC and HAP control efficiency of 95% based on the manufacturer's specifications.

D.1.18 Parametric Monitoring [326 IAC 2-8] [326 IAC 2-4.1-1] [326 IAC 8-2-9]

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) The duct pressure or fan amperage shall be observed at least once per week when the regenerative thermal oxidizer is in operation. When for any one reading, this pressure or fan amperage is outside the normal range provided in the manufacturer's specifications or established in the most recent compliant stack test, the Permittee shall take reasonable steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.19 Dry Filter Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Preparation, Implementation, Records, and Reports in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.20 Record Keeping Requirements

(a) To document compliance with Conditions D.1.5, D.1.6, D.1.7 , D.1.8, D.1.9, D.1.17, and D.1.18 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the HAP usage limits and VOC emission limits established in Conditions D.1.5, D.1.7, D.1.8, D.1.9, D.1.17, and D.1.18.

(1) The VOC, HAP, and solids content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The total HAP, VOC, and solids usage for each month; and

(3) The weight of HAPs, VOCs, PM and PM_{10} emitted for each compliance period.

(4) The continuous temperature records for the thermal incinerator and the temperature used to demonstrate compliance during the most recent compliance stack test.

(5 Weekly records of the duct pressure or fan amperage.

(b) To document compliance with Condition D.1.19, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.21 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.7, D.1.8 and D.1.9 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

(b) Natural gas-fired combustion sources with heat input equal to or less than 10 MMBtu per hour, including:

(1) One (1) natural gas-fired oven with a maximum heat input capacity of 0.78 MMBtu per hour, exhausting at stack No. 4.

(2) Three (3) natural gas-fired liquid tank heaters, each with a maximum heat input capacity of 1.5 MMBtu per hour.

(c) Machining where an aqueous cutting coolant continuously floods the machining interface.

(d) Degreasing operations that do not exceed 145 gallons per 12 months and not subject to 326 IAC 20-6.

(e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.

(f) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(g) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(h) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(i) Paved and unpaved roads and parking lots with public access.

(j) Activities with uncontrolled emissions equal to or less than the exemption thresholds provided in 326 IAC 2-1.1-3(d)(1), including:

(1) One (1) etch cleaner tank;
(2) One (1) etch and strip tank;
(3) One (1) chrome phosphate tank;
(4) Grinding operations; and
(5) One (1) pour and debridge line.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from grinding equipment, machining tools, brazing equipment, cutting torches, soldering equipment, and welding equipment shall not exceed allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.2 Incinerator Requirements [326 IAC 4-2]

Pursuant to 326 IAC 4-2, the burn-off oven shall:

(a) Consist of primary and secondary chambers or the equivalent;

(b) Be equipped with a primary burner unless burning wood products;

(c) Comply with 326 IAC 5-1 and 326 IAC 2;

(d) Be maintained properly as specified by the manufacturer and approved by the commissioner;

(e) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;

(f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;

(g) Be operated so that emissions of hazardous material including but not limited to viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;

(h) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard condition corrected to fifty percent (50%) excess air; and

(i) Not create a nuisance or fire hazard.

If any of the above result, the burning shall be terminated immediately.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: LinEl Signature
Source Address: 101 LinEl Drive, Mooresville, Indiana 46158
Mailing Address: 101 LinEl Drive, Mooresville, Indiana 46158
FESOP No.: F109-14253-00021

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: LinEl Signature
Source Address: 101 LinEl Drive, Mooresville, Indiana 46158
Mailing Address: 101 LinEl Drive, Mooresville, Indiana 46158
FESOP No.: 109-14253-00021

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: LinEl Signature
Source Address: 101 LinEl Drive, Mooresville, Indiana 46158
Mailing Address: 101 LinEl Drive, Mooresville, Indiana 46158
FESOP No.: F109-14253-00021
Facility: Spray Paint Booths PB-1, PB-2, PB-3, and PB-4.
Parameter: Hazardous Air Pollutants (HAPs)
Limit: Emission of a single HAP after controls shall be limited to less than ten tons per twelve (12) consecutive month period. To comply with this limit, the single HAP usage shall be limited to 200 tons per twelve (12) consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: LinEl Signature
Source Address: 101 LinEl Drive, Mooresville, Indiana 46158
Mailing Address: 101 LinEl Drive, Mooresville, Indiana 46158
FESOP No.: F109-14253-00021
Facility: Spray Paint Booths PB-1, PB-2, PB-3, and PB-4.
Parameter: Hazardous Air Pollutants (HAPs)
Limit: Emission of any combination of HAPs after control shall be limited to less than 25 tons per twelve (12) consecutive month period. To comply with this limit, the combined HAP usage shall be limited to 500 tons per twelve (12) consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: LinEl Signature
Source Address: 101 LinEl Drive, Mooresville, Indiana 46158
Mailing Address: 101 LinEl Drive, Mooresville, Indiana 46158
FESOP No.: F109-14253-00021
Facility: Spray Paint Booths PB-1, PB-2, PB-3, and PB-4.
Parameter: Volatile Organic Compounds (VOC)
Limit: Emission of VOC shall be limited to less than 99 tons per twelve (12) consecutive month period. To comply with this limit, the VOC usage shall be limited to 1,980 tons per twelve (12) consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: LinEl Signature
Source Address: 101 LinEl Drive, Mooresville, Indiana 46158
Mailing Address: 101 LinEl Drive, Mooresville, Indiana 46158
FESOP No.: F109-14253-00021
Facility: Spray Paint Booths PB-1, PB-2, PB-3, and PB-4.
Parameter: Solids Delivered to Applicators
Limit: Less than 2,829 tons per twelve (12) consecutive month period (total for all booths).

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: LinEl Signature
Source Address: 101 LinEl Drive, Mooresville, Indiana 46158
Mailing Address: 101 LinEl Drive, Mooresville, Indiana 46158
FESOP No.: F109-14253-00021

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

June 12, 2002

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document
for Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	LinEl Signature
Source Location:	101 LinEl Drive, Mooresville, Indiana 46158
County:	Morgan
SIC Code:	3446
Operation Permit No.:	F109-14253-00021
Permit Reviewer:	ERG/AB

On May 2, 2002, the Office of Air Quality (OAQ) had a notice published in the Martinsville Daily Reporter, Mooresville, Indiana, stating that LinEl Signature had applied for a Federally Enforceable State Operating Permit (FESOP) to operate an architectural metal work plant manufacturing skylights and other architectural products with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On May 2, 2002, LinEl Signature submitted comments on the proposed FESOP. A summary of the comments is as follows:

Comment 1: LinEl Signature requested the proposed permit be revised to enable the company to continue to use the 2.5 MMBtu per hour drying oven after the June 28, 2002 deadline. This drying oven is currently used to cure paints and is being replaced by the new 5.175 MMBtu per hour curing oven. LinEl plans to use the existing 2.5 MMBtu per hour oven to dry (remove water) from aluminum parts following washing in the cleaning tanks.

Response to Comment: The IDEM, OAQ has revised the permit to allow LinEl Signature to use the existing 2.5 MMBtu per hour oven after the June 28, 2002 deadline. However, LinEl Signature will be allowed to use the oven after this deadline solely for driving off water from aluminum parts. When used for removing water from aluminum parts, the oven will be considered an insignificant activity as defined in 326 IAC 2-7-1(21)(G)(i)(AA)(aa). Condition D.1.13 has been revised as follows:

D.1.13 Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1] [326 IAC 8-2-9] [326 IAC 2-8]

To comply with Conditions D.1.5, D.1.6, D.1.7 and D.1.8, the regenerative thermal oxidizer for VOC and HAP control shall be in operation no later than June 28, 2002 and shall control emissions from the spray paint booths PB-1, PB-2, PB-3 and PB-4, and the 5.175 MMBtu per hour curing oven at all times that these paint booths are in operation. **Beginning June 28, 2002**, paint booths A, B, C ~~and 2.5 MMBtu curing oven (Section D.2) will~~ **shall** be decommissioned **and the 2.5 MMBtu per hour oven shall be used solely for removing water from aluminum parts after washing** ~~beginning June 28, 2002.~~

June 12, 2002

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	LinEl Signature
Source Location:	101 LinEl Drive, Mooresville, Indiana 46158
County:	Morgan
SIC Code:	3446
Operation Permit No.:	F109-14253-00021
Permit Reviewer:	ERG/AB

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application and a new construction application from LinEl Signature relating to the operation of an architectural metal work plant manufacturing aluminum skylights, handrails, and architectural metal. LinEl Signature was issued FESOP 109-7257-00021 on April 23, 1997.

History

This source was issued a FESOP (Permit No. 109-7257-00021) on April 23, 1997 and submitted an application for renewal on April 5, 2001. The original FESOP included a VOC usage limit of 25 tons per year for the three paint booths (identified as spray booths A, B, and C). The source voluntarily accepted this limit so that 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) was not applicable. However, an inspection of the source by IDEM officials, found that LinEl Signature had exceeded the VOC limit on several occasions. On June 19, 2001, LinEl Signature entered into a consent decree with IDEM, OAQ in which they agreed to install a thermal oxidizer and an emission collection system to comply with the provisions of 326 IAC 8-2-9. On March 27, 2002, LinEl Signature submitted a construction permit application for the construction of a regenerative thermal oxidizer, a new curing oven and four new paint booths (identified as PB-1, PB-2, PB-3, and PB-4).

LinEl Signature is replacing the existing curing oven and paint booths because these existing units could not be equipped with efficient collection systems for emissions of VOCs. In order to comply with the consent decree, LinEl Signature must install the new emission units, control device, and collection system by June 28, 2002. After June 28, 2002, LinEl Signature must discontinue use of the existing curing oven and paint booths A, B, and C.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

Three (3) spray paint booths (identified as A, B, and C), constructed in 1987 and used for coatings are applied using air atomization spray guns. Paint booths A and B have a maximum capacity of 253.1 square feet per hour. Paint booth C has a maximum capacity of 56.25 square feet per hour.

Paint booth A exhausts at stack A; paint booth B exhausts at stack B; and paint booth C exhausts at stack C. Emissions of particulate matter are controlled using dry filters.

[Note: On or before June 28, 2002, these spray paint booths will be replaced by the new booths described below]

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

The application submitted March 27, 2002 includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4 (11).

(a) Four (4) spray paint booths (identified as PB-1, PB-2, PB-3, and PB-4), constructed in 2002, equipped with electrostatic air atomization spray guns and used to paint aluminum skylights, handrails, and architectural metal. Each paint booth has a maximum throughput capacity of 500 square feet of aluminum per hour. Emissions of particulate matter are controlled using dry filters, while emissions of VOC and HAP are controlled using a regenerative thermal oxidizer.

(b) One (1) natural gas-fired curing oven with a maximum heat input capacity of 5.175 MMBtu/per hour, exhausting at stack No. 3, with VOC and HAP emissions controlled using a regenerative thermal oxidizer.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than 10 MMBtu per hour, including:

(1) One (1) natural gas-fired oven with a maximum heat input capacity of 2.5 MMBtu per hour, exhausting at stack D1.

[Note: This oven will be replaced by the 5.175 MMBtu/per hour curing oven described above]

(2) One (1) natural gas-fired oven with a maximum heat input capacity of 0.78 MMBtu per hour, exhausting at stack No. 4.

(3) Three (3) natural gas-fired liquid tank heaters, each with a maximum heat input capacity of 1.5 MMBtu per hour, exhausting at stacks No. 5, No. 6, and No. 7.

(c) Machining where an aqueous cutting coolant continuously floods the machining interface.

(d) Degreasing operations that do not exceed 145 gallons per 12 months and not subject to 326 IAC 20-6.

(e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.

(f) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(g) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(h) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(i) Paved and unpaved roads and parking lots with public access.

(j) Activities with uncontrolled emissions equal to or less than the exemption thresholds provided in 326 IAC 2-1.1-3(d)(1), including:

(1) One (1) etch cleaner tank;

(2) One (1) etch and strip tank;

(3) One (1) chrome phosphate tank;

(4) Grinding operations; and

(5) One (1) pour and debridge line.

Existing Approvals

The source has been operating under previous approvals including , but not limited to, the following:

(a) FESOP 109-7257-00021, issued on April 23, 1997; and expiring on April 23, 2002

All conditions from previous approvals were incorporated into this FESOP except the following:

FESOP 109-7257-00021, issued on April 23, 1997.

Condition D.1.1 (Volatile Organic Compounds)

The total amount of volatile organic compounds (VOC), including clean-up solvents, delivered to the applicators of paint spray booths A, B, and C shall be limited in total to 24.0 tons per year, based on a 365 day period, rolled on a daily basis. During the first 365 days of operation, VOC usage shall be limited such that the total VOC used divided by the accumulated days of operation shall not exceed 131.5 pounds per day. Therefore, 326 IAC 8-2-9 will not apply.

Reason not incorporated: A recent inspection by IDEM, found that the source had exceeded the 25 tons per year daily rolling average for VOC usage over a period of approximately one and half years. Hence, the source became subject to 326 IAC 8-2-9 and must comply with this rule using one of the methods described in 326 IAC 8-1-2. Note that once a source becomes subject to an Article 8 rule, they are no longer permitted to take a limit to avoid an Article 8 rule.

Enforcement Issue

(a) IDEM is aware that the spray paint booths (identified as A, B and C) were not in compliance with Condition D.1.1 of their current FESOP. This condition required the source to limit VOC usage for the paint spray booths A, B, and C to 25 tons per year. The source voluntarily accepted this limit so that 326 IAC 8-2-9 (Miscellaneous Metal Coating

Operations) was not applicable. During a recent inspection of the source by IDEM officials, the source was discovered to be out of compliance with the VOC limit.

The source had exceeded 25 tons of VOC usage per year over a one and half year period. Consequently, the source is now subject to 326 IAC 8-2-9 and will comply with this rule using one of the methods described in 326 IAC 8-1-2.

(b) IDEM has reviewed this matter and has taken appropriate action. The compliance schedule in this proposed permit (see Condition D.1.6) will satisfy the requirements of the above stated requirement.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on April 5, 2001. Additional information was received on August 17, 2001, August 30, 2001 and January 31, 2002. An administratively complete construction permit application was received on March 27, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 4)

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	9,178
PM-10	9,178
SO_2	0.03
VOC	45,739
CO	3.8
NO_x	4.6

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Xylene	8,067
Toluene	3,882
Chromium Compounds	101.9
Ethyl Benzene	1,614
Glycol Ethers	1,614

Methy Ethyl Ketone	4,730
Dimethyl Phthalate	5,720
Methyl Isobutyl Ketone	5,402
TOTAL	33,752

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP). The source has chosen to limit emissions of volatile organic compounds to less than 100 tons per year, and hazardous air pollutants (HAPs) to below ten (10) tons per twelve (12) consecutive month period for any single HAP and twenty-five (25) tons per twelve (12) consecutive month period for any combination of HAPs.

(d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on April 23, 1997, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F109-7257-00021; issued on April 23, 1997).

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Paint Booths PB-1, PB-2, PB-3, and PB-4	Less than 99	Less than 99	0.00	Less than 99 tons/year	0.00	0.00	Less than 10 tons/year of any single HAP and Less than 25 tons/year of any combination of HAPs.
Insignificant Emission Units	0.3	0.3	0.02	0.2	2.9	3.4	Negligible
Total PTE After Issuance	Less than 100	Less than 100	0.02	Less than 100 tons/year	2.9	3.4	Less than 10 tons/year of any single HAP and Less than 25 tons/year of any combination of HAPs.

County Attainment Status

The source is located in Morgan County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Morgan County has been designated as attainment or unclassifiable for ozone.

(b) Morgan County has been classified as attainment or unclassifiable for PM_{10}, SO_2, CO, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

The degreasing operations are not subject to the provisions of 40 CFR 63, Subpart T - National Emission Standards for Halogenated Solvent Cleaning, because LinEl Signature does not use halogenated solvents in its degreasing operations.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Morgan County and the potential to emit PM_{10}, CO, VOC, NO_x and SO_2 is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-4.1-1 (New Source Toxic Control)

This source is subject to the provisions of 326 IAC 2-4.101 and 40 CFR 63, Subpart B, because, after the replacement of the paint booths and curring oven, this source will meet the definition of “a reconstructed major source” as defined in 40 CFR 63.41. Emissions of hazardous air pollutants at the source are generated primarily by the surface coating operations (paint application and curring). As a part of the construction, the source will install a regenerative thermal oxidizer and emission collection system to control emissions of hazardous air pollutants from these activities. This control represents the Maximum Achievable Control Technology (MACT) currently available for this type of operation.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Paint Booths

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations) the particulate matter (PM) from the spray paint booths shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters shall be in operation at all times the spray paint booths are in operation, in order to comply with this limit.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

LinEl Signature's existing FESOP 109-7257-00021 included a VOC limit of 25 tons per year in order to make 326 IAC 8-2-9 (Miscellaneous Metal Coating) not applicable. However, LinEl/Signature exceeded this limit over a period of one to two years after this permit was issued. As a result of exceeding the 25 tons per year VOC limit, LinEl/Signature became subject to the requirements of 326 IAC 8-2-9 on March 12, 1998. LinEl/Signature entered into a consent decree with IDEM, OAQ on June 19, 2001.

Under the terms of the consent decree, LinEl/Signature are required to comply the following requirements:

1. On or before March 1, 2002, the LinEl/Signature shall submit documentation which confirms that the company has secured the funds necessary to finance the purchase and installation of the control equipment noted in paragraph 2. In addition, on or before March 1, 2002, the company shall submit documentation confirming that the control equipment have been ordered and the anticipated dates of delivery and installation. If LinEl/Signature fails to secure funds, order the control equipment, and submit documentation confirming those actions by March 1, 2002, then LinEl/Signature must cease operation of the spray paint booths A, B, and C until such time as the control equipment is installed.

2. On or before June 28, 2002, LinEl/Signature shall install and commence operation of a rotary concentrator and thermal oxidizer to control emissions from paint booths A, B, and C or cease operation of these paint booths until such time as the controls are installed and operational.

3. On or before August 27, 2002, LinEl/Signature shall conduct compliance tests to confirm that the capture and destruction efficiency of the new rotary concentrator and the thermal oxidizer comply with the limitations specified in 326 IAC 8-2-9. This testing shall be conducted in accordance with the Source Sampling Procedures specified in 326 IAC 3-6, and will be used to determine the proper capture and destruction efficiency necessary to achieve compliance with 326 IAC 8-2-9.

   Pursuant to 326 IAC 8-2-9, the source must also comply with the following requirements:

   (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 when using extreme performance coating pounds of VOC per gallon of coating excluding water, delivered to the air atomization spray guns.

   (b) Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 95%, the VOC content of the coating shall not exceed 133.4 pounds of VOC per gallon of coating solids delivered to the applicator.

$$E = \frac{L}{1 - L/D} = \frac{3.5}{(1 - 3.5/7.36)} = 6.67 \text{lbsVOC/gallons of coating solids}$$

Where L = Emission limit (lbs VOC/gal. of coating).
D = Density of VOC per gallon of coating = 7.36 lbs/gal.
E = Equivalent emission limit (lbs VOC/gal. of coating solids as applied).

Maximum VOC Content

$$\text{(lbs VOC / gallon of coating solids)} = \frac{6.67 \text{ lbs VOC / gallon of coating solids}}{(1 - 0.95)} = 133.4$$

   (c) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

326 IAC 2-8 (FESOP)

The potential to emit xylene is greater than 10 tons per year and the potential to emit any combination of HAPs is greater than 25 tons per year. The source's current FESOP includes HAP usage limits which limit HAP emissions from the entire source to less than the 10/25 tons/year thresholds. Since the source will be installing a regenerative thermal oxidizer to control emissions of HAPs the source will be permitted under this permit to use the regenerative thermal oxidizer to comply with the HAP limits once the control device is operational. The following conditions have been added to the permit.

   (a) Prior to the installation of the control equipment required in Condition D.1.2 and pursuant to 326 IAC 2-8-4, the Permittee shall limit the amount of hazardous air pollutants used in the spray painting booths to less than ten (10) tons per twelve (12) consecutive month

period for any single HAP and less than twenty-five (25) tons per twelve (12) consecutive month period for any combination of HAPs.

(b) After the installation of the new paint booths and the control equipment, the existing paint booths A, B, and C shall be de decommissioned and the emissions from the new paint booths PB-1, PB-2, PB-3 and PB-4 shall be controlled using the regenerative thermal oxidizer. The amount of hazardous air pollutants (HAPs) used in the painting booths PB-1, PB-2, PB-3, and PB-4 shall be limited as follows:

(1) The amount of any single HAP used in the spray paint booths shall be limited to two hundred (200) tons per twelve (12) consecutive month period. This is equivalent to emissions of any single HAP from the entire source to less than ten (10) tons per twelve (12) consecutive month period.

(2) The amount of any combination of HAPs used in the spray paint booths shall be limited to five hundred (500) tons per twelve (12) consecutive month period. This is equivalent to emissions of any combination of HAPs from the entire source to less than twenty-five (25) tons per twelve (12) consecutive month period.

The HAP usage limits were calculated as follows:

HAP Usage = (10 tons/year) / (1 - EF) = 200 tons of a single HAP per year

HAP Usage = (25 tons/year) / (1 - EF) = 500 tons of total HAPs per year

Where EF equals 95% (the overall efficiency for the collection and control device).

The potential to emit volatile organic compounds (VOC) is greater than 100 tons per year. The source has agreed to limit the emissions of VOC to less than 100 tons per year by limiting the amount of VOC used in the spray paint booth and using the new regenerative thermal oxidizer. The following limits have been added to the permit:

(a) Prior to the installation of the new paint booths (PB-1, PB-3, and PB-4) and the control equipment required for compliance with the consent decree, the Permittee shall limit the amount of VOC used in the spray paint booths A, B and C to 25 tons per twelve (12) consecutive month period.

(b) After the installation of the new paint booths and control equipment, the existing paint booths (A, B, and C) shall be decommissioned and the VOC emissions from the new paint booths (PB-1, PB-2, PB-3 and PB-4) shall be controlled using the regenerative thermal oxidizer. The total amount of VOC used in spray paint booths PB-1, PB-2, PB-3 and PB-4 shall be limited to 1,980 tons per twelve (12) consecutive month period. This limit was calculated as follows:

VOC Usage = (99 tons/year) / (1 - EF) = 1,980 tons of VOC per year

The potential to emit PM_{10} is greater than 100 tons per year. The source has agreed to limit the emissions of PM_{10} to less than 100 tons per year by limiting the amount of solids delivered to the applicators in the paint booths to 2,829 tons per twelve (12) consecutive month period, based on a sixty-five (65) percent transfer efficiency and a ninety (90) percent dry filter control efficiency. This throughput limitation is equivalent to PM_{10} emissions of less than 99.0 tons per year for the paint booths and PM_{10} emissions of less than 100 tons per year for the entire source. As a result of this PM_{10} limit, and since PM emissions from the paint booths are equal to PM_{10} emissions, the PM

emissions from the entire source will also be limited to less than 100 tons per year. This limit was calculated as follows:

$$\text{Solids Usage (tons / year)} = \frac{99}{(1 - 0.90)\,(1 - 0.65)} = 2{,}829 \text{ tons / year}$$

Compliance with these limits will make the provisions of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to this source.

State Rule Applicability - Insignificant Activities.

326 IAC 6-3-2 (Process Operation)

The allowable PM emission rate from grinding equipment, machining tools, brazing equipment, cutting torches, soldering equipment, and welding equipment shall not exceed allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

326 IAC 4-2 (Incinerators)

Pursuant to 326 IAC 4-2, the burn-off oven shall:

(a) Consist of primary and secondary chambers or the equivalent;

(b) Be equipped with a primary burner unless burning wood products;

(c) Comply with 326 IAC 5-1 and 326 IAC 2;

(d) Be maintained properly as specified by the manufacturer and approved by the commissioner;

(e) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;

(f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;

(g) Be operated so that emissions of hazardous material including but not limited to viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;

(h) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard condition corrected to fifty percent (50%) excess air; and

(i) Not create a nuisance or fire hazard.

If any of the above result, the burning shall be terminated immediately.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The degreasing operations are not subject to 326 IAC 8-3 (Organic Solvent Degreasing Operations), because the source performs only hand-wipe degreasing operations.

Testing Requirements

On or before August 27, 2002, the Permittee will be required to perform VOC testing utilizing Methods 25 (40 CFR 60, Appendix A) or other methods as approved by the Commissioner. This testing is required under the source's consent decree with IDEM signed on June 19, 2001. The testing is necessary because the collection system and control device must be installed, maintained and operated to ensure compliance with 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations). In addition, the VOC testing will also be used to determine compliance with the HAP emission limits included in Condition D.1.3 of the draft permit. The hazardous air pollutants emitted by the spray painting operations are also volatile organic compounds. Hence, the VOC stack testing required under the consent decree will also ensure compliance with the FESOP limit.

Testing was not previously required for this source because the source's current FESOP included VOC and HAP usage limits for which compliance could easily be determined using coating and solvent usage records and Material Safety Data Sheets (MSDSs).

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP. The source is also subject to the following compliance monitoring requirements for the thermal oxidizer:

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) The duct pressure or fan amperage shall be observed at least once per week when the regenerative thermal oxidizer is in operation. When for any one reading, this pressure or fan amperage is outside the normal range provided in the manufacturer's specifications or established in the most recent compliant stack test, the Permittee shall take reasonable steps in accordance with the Compliance Response Plan.

These monitoring conditions are necessary because the collection system and the thermal oxidizer must operate properly to ensure compliance with 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this architectural metal work plant shall be subject to the conditions of the attached proposed (FESOP No.: F109-14253-00021).

Appendix A: Emission Calculations
HAP Emission Calculations
Surface Coating Operations
Company Name: LinEl Signature
Address City IN Zip: 101 LinEl Drive, Mooresville, IN 46158
CP#: 109 - 14253
Plt ID: 109 - 00021
Permit Reviewer: ERG/AB
Date: 09/28/01

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Glycol Ethers	Weight % Ethyl Benzene	Weight % Chromium Compounds	Weight % Methyl Ethyl Ketone	Weight % Dimethyl Phthalate	Weight % MIBK	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Chromium Compounds Emissions (ton/yr)	Methyl Ethyl Ketone Emissions (ton/yr)	Dimethyl Phthalate Emissions (ton/yr)	MIBK Emissions (ton/yr)
Paint Booth 1																			
Akzo Primer	9.32	0.260000	500.00	7.40%	7.19%	7.71%	1.70%	0.96%	0.00%	7.29%	4.12%	392.70	381.56	409.15	90.22	50.95	0.00	386.87	218.64
Paint Booth 2																			
Primer	9.32	0.260000	500.00	7.40%	7.19%	7.71%	1.70%	0.96%	0.00%	7.29%	4.12%	392.70	381.56	409.15	90.22	50.95	0.00	386.87	218.64
Paint Booth 3																			
Topcoat	9.4	1.490000	500.00	12.70%	5.44%	5.96%	2.50%	0.00%	8.25%	8.63%	8.66%	3895.49	1668.62	1828.12	766.83	0.00	2530.53	2645.56	2656.29
Paint Booth 4																			
Topcoat	8.17	1.490000	500.00	12.70%	5.44%	5.96%	2.50%	0.00%	8.25%	8.63%	8.66%	3385.76	1450.28	1588.91	666.49	0.00	2199.41	2300.72	2308.72

Potential Emissions Before Controls	**8066.66**	**3882.02**	**4235.34**	**1613.75**	**101.89**	**4729.95**	**5720.01**	**5402.29**
Potential Emissions After Controls	**403.33**	**194.10**	**211.77**	**80.69**	**5.09**	**236.50**	**286.00**	**270.11**

Note: The estimated potential to emit shown above assumes that the electrostatic spray air atomization guns are operated continuously at the full flow rate for 8,760 hours per year. These calculations may over estimate the potential HAP emissions from the painting operations because other process limitations at this plant may limit the amount of finished parts that can be painted per hour. The source has indicated that for booths equipped with more than one spray gun, not all spray guns are operated simultaneously for all products.

Total HAP Emissions = 33751.89 tons/yr
Total HAP Emissions After Controls = 1687.59 tons/yr
Limited Total HAP Emissions before Controls = 500.00 tons/yr
Limited Total HAP After Controls = 25.00 tons/yr

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Hapcalc.wk4 9/95

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: **LinEl Inc./Signature**
Address City IN Zip: **101 LinEl Drive, Mooresville, IN 46158**
CP: **109 - 14253**
Plt ID: **109 - 00021**
Reviewer: ERG/AB
Date: 04/25/02

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Paint Booth 1																
Primer	9.32	59.87%	0.0%	59.9%	0.0%	20.50%	0.26000	500.000	5.58	5.58	725.38	17409.24	3177.19	745.37	27.22	65%
Paint Booth 2																
Primer	9.32	59.87%	0.0%	59.9%	0.0%	20.50%	0.26000	500.000	5.58	5.58	725.38	17409.24	3177.19	745.37	27.22	65%
Paint Booth 3																
Top Coat	9.40	64.20%	0.0%	64.2%	0.0%	21.68%	1.49000	500.000	6.03	6.03	4495.93	107902.22	19692.16	3843.34	27.84	65%
Paint Booth 3																
Topcoat	9.40	64.20%	0.0%	64.2%	0.0%	21.68%	1.49000	500.000	6.03	6.03	4495.93	107902.22	19692.16	3843.34	27.84	65%

Potential Emissions Before Controls	**10,442.62**	**250622.92**	**45738.68**	**9177.42**
Potential Emissions After Controls			**2,286.93**	**917.74**
Limited Potential Emissions Before Controls			**1,980.00**	**2,829.00**
Limited Potential Emissions After Controls			**99.0**	**99.0**

Note: The estimated potential to emit shown above assumes that the electrostatic spray air atomization guns are operated continuously at the full flow rate for 8,760 hours per year. These calculations may over estimate the potential VOC and paticulate emissions from the painting operations because other process limitations at this plant may limit the amount of finished parts that can be painted per hour. The source has indicated that for booths equipped with more than one spray gun, not all spray guns are operated simultaneously for all products.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Ovens and Heaters

Company Name: **LinEl Signature**
Address City IN Zip: **101 LinEl Drive, Mooresville, IN 46158**
CP: **109 - 14253**
Plt ID: **109 - 00021**
Reviewer: ERG/AB
Date: 03/29/02

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
10.46	91.6

Includes two ovens (rated at 5.175 MMBtu/hr and 0.78 MMBtu/hr) and three heaters (each rated at 1.5 MMBtu/hour).

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.3	0.3	0.03	4.6	0.3	3.8

*PM emission factor is filterable and condendable PM.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Ovens and Heaters
HAPs Emissions

Company Name: **LinEl Signature**
Address City IN Zip: **101 LinEl Drive, Mooresville, IN 46158**
CP: **109 - 14253**
Plt ID: **109 - 00021**
Reviewer: ERG/AB
Date: 03/29/02

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	9.617E-05	5.495E-05	3.434E-03	8.243E-02	1.557E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.290E-05	5.037E-05	6.411E-05	1.740E-05	9.617E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.